1. Did you every do a characterization of the site as the City did and why was this site not made a CERCLA (Superfund) site?

DTSC did not provide oversight to the City of Riverside's investigation prior to 2005. When the oversight agreement was executed, DTSC reviewed the available environmental data, and determined that additional investigation was needed. Eventually a Response Plan for cleanup was developed and approved.

To be on the National Priorities List or more commonly referred to as a "Superfund Site" a site must be evaluated by US EPA (United States Environmental Protection Agency) and proposed in a Federal Register Notice. The evaluation considers current human health and environmental exposures. This process usually takes a number of years to be completed. Riverside Ag Park is currently being cleaned up with oversight from DTSC with input from US EPA. Given the level of oversight and cleanup being conducted at this site, it is unlikely that the site would meet the standards for listing on the NPL.

2. If the reports showed such an elevated level of PCBs and knowing this was an FUD (Formerly Used Defense Site) why did no one contact any health agencies to do any studies or tests such as the Cal/EPA Office Of Environmental Health Hazard Assessment (OEHHA) ?

There was no evidence indicating that the surrounding community was significantly affected by the Ag Park. Specifically, most of the soil samples collected near the Ag Park boundary were non-detects or had much lower levels of PCBs than the 0.22 mg/kg cleanup goal. In addition, 11 of the 16 samples collected in the four residences adjacent to the Ag Park had no detectable PCB levels in soil, and the five detected PCB concentrations were below the residential screening level. Based on these results and the planned cleanup, there was no basis to contact health agencies. The toxicological review was conducted by DTSC's Human and Environmental Risk Office (HERO) and thus, consultation with OEHHA was not warranted.

3. Why was the NCP not followed?

This property has been managed under the California Land Reuse and Revitalization Act (CLRRA), not under the NCP.

4. Did you ever question the City as to why they waited almost 2 years to decide to clean up the site knowing the PCB levels were so high?

Yes, we had multiple discussions with the City regarding their efforts to investigate the digester incident. The initial investigation by the City's consultants started in August 2003 following the digester incident, and lasted until 2004. Soil tests were performed

for analyses of PCBs and other chemicals such as dioxins/furans, metals, VOCs, and SVOCs. DTSC became involved in 2005 and directed FRA to conduct additional investigation, and then prepare a Response Plan for cleanup of the Ag Park.

5. Why did it take four years to start remediation from the start of the first agreement in 2005?
A CEQA (California Environmental Quality Act) challenge in court resulted in delays.

6. Why did it take another 4 years to start phase 2 remediation?
After the CEQA challenge was resolved, the developer experienced funding issues which resulted in the delay.

7. Since the last testing showed much of the site still over 0.50 mg/kg, what does that say about the two phase testing, and how much of the 165,000 tons of dirt taken to Azusa was too contaminated for the site to recycle?
Yes, the last investigation indicated several concentrations of PCBs over the cleanup goal of 0.22 mg/kg. The concentration of 0.22 mg/kg used throughout the project is a conservative cleanup goal, which at the time of the Phase 1 and Phase 2 cleanups was the Preliminary Remediation Goal for residential development as issued by US EPA; this number has since been raised to 0.24 mg/kg. . Concentrations between 0.22 mg/kg and 1 mg/kg are protective of public health in a residential setting and fall within both DTSC and USEPAs' acceptable risk management range.

Landfills have specific testing requirements for accepting waste, and they ensure that incoming loads comply with landfill related regulations. DTSC does not provide regulatory oversight for Azusa Landfill.

8. Has this toxic dirt been recycled and reused? Where?
Soil removed from the site has been disposed of at approved disposal facilities.

9. Why are the same people that failed twice running the third operation?
DTSC management supports the work conducted by staff, and recognizes that all required protocols were and continue to be followed for the oversight activities at the Ag Park. These protocols are consistent with standard environmental practice.

10. How tall are the dust monitors on site?
The dust monitors are approximately 7 feet tall.

11. At what wind speed is the site shut down?
Excavation activities are stopped at sustained wind speeds of 15 miles per hour or gusts over 25 miles per hour as measured at the onsite weather station.

12. Does the site supervisor hold the proper AQMD certification as requires in rule 403 and do you have a copy with you we can have?
It has been confirmed with AQMD that a Rule 403 work plan is not required for the Ag Park; regardless, Rule 403 requirements will generally be adhered to in the interest of enhancing community and worker protection. Both members of the Dust Team (DTSC and consultant) have certification as Dust Control Supervisors.

13. Who is authorized to shut down the site if the rules are not followed?
Anyone onsite has the authority to stop excavation activities for any reason. However, the primary purpose of the DTSC and consultant Dust Control Supervisors is to monitor dust levels and stop work if necessary. If a situation arises where dust is not controlled, there is a 6 step process in place prior to re-initiating excavation activities:
1. Stop excavation immediately
2. Evaluate the source of the exceedance (although we call them dust monitors, the reality is that they are particulate monitors which measure all forms of particulates other than dust ,including vehicle exhaust and even water droplets)
3. Take action to mitigate the source
4. Conduct additional monitoring to assess the effectiveness of the action
5. Re-initiate excavation
6. Monitor the area closely to ensure ongoing effectiveness of action

14. What gives you the right to work to the site if the City has not lifted the stop work order?
The City's stop work order applies to construction related activities. DTSC's oversight of the cleanup does not fall under the City's jurisdiction.

15. Where is the tank for the street sweeper emptied?
The street sweeper is emptied into the staging area with the soil to be removed from the site.

16. How much dirt has been removed so far, and how many feet down have you had to go?
As of 10/10/16, 1,065 truckloads of soil have been removed from the site as noted in the daily report from the consultant which is posted to Envirostor. 1,065 truckloads equates

to approximately 21,000 tons of soil material removed. So far, all excavations except in the west gully, have extended to one foot below the surface. In the west gully the excavations have extended two feet below the surface. Preliminary analytical results received thus far indicate that additional excavation depth is necessary in some areas.

17. It looks like the road is being built is it?

The Jurupa Avenue extension is not currently being constructed. Excavation was required within the road as part of the approved workplan. At the beginning of field work excavation was initiated in the road first so that gravel could be placed for truck travel as per AQMD Rule 403. AQMD Rule 403 requires in section (d)(5) that any site with "No person shall conduct an active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or more of bulk material without utilizing at least one of the measures listed in subparagraphs (d)(5)(A) through (d)(5)(E)..." Section (d)(5)(A) includes "Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long." In the case of Riverside Agricultural Park the pad has been extended beyond the required length to approximately 200 feet long. The light colored material that is observed from the eastern gate is gravel.

18. Why were we told that FRA owns all the property behind the gate when property line records show the property line ends where the original gate was built?

DTSC is not aware of statements made regarding the exact property line. In general, FRA owns the current Ag Park property.

19. If the gate is not the property line are you not in violation of rule 403?

AQMD Rule 403 does not use the term 'property line'. AQMD Rule 403 states in section (d)(4) that "No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation." Since the area immediately inside the fence in unpaved, it is considered a source for track-out material as vehicles pass. Therefore, the "point of origin" begins at the current fenceline. However, as mentioned, all aspects of Rule 403 do not apply to this cleanup.

20. Why is there still visible track out at the end of the day?

AQMD Rule 403 definition of Track Out is "any bulk material that adheres to and agglomerates to the on the exterior surface of motor vehicles, haul trucks and equipment (including tires) that have been release onto a paved road and can be removed by a vacuum sweeper or broom sweeper under normal operating conditions."

AQMD Rule 403 continues in section (d)(4) that "...all track-out from an active operation shall be removed at the conclusion of each workday..." (also noted at the bottom of slide # 26 of the presentation) For the Riverside Agricultural Park project, a vacuum street sweeper operates full time during offsite hauling activities including an approximate period of one hour after the last haul truck leaves the site. The street sweeper brushes and vacuums up any material on the road regardless of the source on a continuous basis, fulfilling the requirements of AQMD Rule 403 continuously rather than at the end of the work day as required. On days when offsite transport was not occurring a regular broom was used to clean the roadway